

1 Honorable Christopher M. Alston  
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6 IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

8 In re: ) Chapter 7  
9 JACK CARLTON CRAMER JR., ) Bankruptcy No. 18-13383  
10 Debtor(s). ) STIPULATED MOTION FOR AN  
11 ) AMENDED ORDER APPROVING  
12 ) COMPROMISE OF CLAIM

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13 COME NOW the debtor, Jack Carlton Cramer Jr., though counsel, Henry & DeGraaff, P.S.,  
14 and Christina L. Henry, and the duly appointed trustee, Edmund J. Wood, through counsel The  
15 Livesey Law Firm, and Rory C. Livesey, and stipulate as follows:

16 On August 25, 2020, this Court entered an order approving a settlement between the trustee  
17 and the debtor (Docket No. 212). The settlement authorized the debtor to proceed with his efforts  
18 to obtain a reverse mortgage on his residence located at 15605 - 63<sup>rd</sup> Avenue N.E., Kenmore,  
19 Washington 98028, and use the proceeds to pay the enumerated creditors. The original order  
20 addressed the disputed Claim No. 4 of 21<sup>st</sup> Mortgage Corporation. Funds to pay Claim No. 4 were  
21 to be set aside awaiting the outcome of the debtor's challenge to the claim.

22 The debtor has successfully challenged Claim No. 4 of 21<sup>st</sup> Mortgage Corporation and the  
23 claim has been withdrawn.

24 The debtor and the trustee are requesting that the Court enter an amended order approving  
25 the settlement that removes 21<sup>st</sup> Mortgage Corporation and Claim No. 4 from the list of creditors  
being paid. The claim made up approximately 26 percent of the claims against the estate and will  
substantially reduce the amount of money the debtor will need to secure from the reverse mortgage.  
The expectation is an amended order showing less debt will facilitate the debtor's reverse mortgage.

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Notice to creditors of this motion is not necessary as it does not impact the distribution to the remaining creditors authorized in the original order.

3 WHEREFORE, the parties pray for an order accordingly.

4 RESPECTFULLY SUBMITTED this 8<sup>th</sup> day of January, 2021.

5 THE LIVESEY LAW FIRM

7 Y.-G. Li WSDA

8 Attorney for Edmund J. Wood, Trustee

RESPECTFULLY SUBMITTED this 8 day of January, 2021.

HENRY & DEGRAAFF, P.S.

12 /S/ *Christina L. Henry*

13 Christina L. Henry, WSBA #35333  
Seattle, Washington

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